

EXHIBIT 71

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

Anas ELHADY, et al.,

Plaintiffs,

V.

CHARLES H. KABLE, et al.,

Defendants.

Case No. 1:16-cv-375 (AJT/JFA)

SUPPLEMENTAL DECLARATION OF DEBORAH O. MOORE

I, Deborah O. Moore, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. I am the Branch Manager of the Transportation Security Redress Branch in the Office of Civil Rights and Civil Liberties, Ombudsman and Traveler Engagement at the Transportation Security Administration (TSA) of the Department of Homeland Security (DHS). I have held this position since June 16, 2013. As part of my official duties, I am responsible for the management of the DHS Traveler Redress Inquiry Program (DHS TRIP). The statements made within this Declaration are based upon my personal knowledge and information made available to me in my official capacity.
2. On March 1, 2019, I executed a declaration regarding DHS TRIP, its operations, and each plaintiff's redress history. DEX 4. To amend the record with respect to two plaintiffs, Michael Edmund Coleman and John Doe 3, I now make this supplemental declaration.
3. In my previous declaration, I stated that plaintiff Coleman submitted a DHS TRIP inquiry on October 1, 2015, but that he failed to submit required documentation, resulting in DHS TRIP administratively closing his inquiry on or about November 2, 2015. DEX 4, ¶ 31.

2. On March 1, 2019, I executed a declaration regarding DHS TRIP, its operations, and each plaintiff's redress history. DEX 4. To amend the record with respect to two plaintiffs, Michael Edmund Coleman and John Doe 3, I now make this supplemental declaration.

3. In my previous declaration, I stated that plaintiff Coleman submitted a DHS TRIP inquiry on October 1, 2015, but that he failed to submit required documentation, resulting in DHS TRIP administratively closing his inquiry on or about November 2, 2015. DEX 4, ¶

31.

4. Upon further review into archived files, DHS TRIP has located an email, dated September 15, 2015, in which plaintiff Coleman's representative submitted the required documentation. Due to an administrative error, this documentation was not uploaded along with plaintiff Coleman's traveler inquiry form in DHS TRIP's record system at the time of submission.
5. In light of this newly-discovered information, DHS TRIP will follow up with plaintiff Coleman to determine whether he wishes to pursue the DHS TRIP redress process now.
6. With respect to John Doe 3, DHS TRIP has reviewed Plaintiff's MSJ Exhibit 93 and has no record of receiving the submission email, dated August 5, 2014. It is possible that it bounced back due to file size limitation. DHS TRIP is unable to receive inquiries via email that exceed 10 megabytes (MB). DEX 4, ¶ 22, n. 8.

DATED: March 29, 2019
Arlington, VA



DEBORAH O. MOORE
Director, DHS TRIP & Branch Manager
Transportation Security Redress Branch
Civil Rights and Liberties, Ombudsman & Traveler
Engagement
Transportation Security Administration